REMARKS

In the Office Action dated May 17, 2005, claims 1, 2, 5, 6, 8-13, and 15 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,263,064 (O'Neal); claims 3, 4, 37-40, and 43 were rejected under § 102 over U.S. Patent No. 6,798,767 (Alexander); claims 16-22 and 44 were rejected under § 103 over Alexander in view of "Applicant's Admitted Prior Art (AAPA)"; claims 23, 25-31, and 33-35 were rejected under § 103 over Alexander in view of "AAPA" and O'Neal; claim 7 was rejected under § 103 over O'Neal in view of "AAPA"; and claim 14 was rejected under § 103 over O'Neal in view of Alexander.

Amended claim 1 is allowable over O'Neal. Claim 1 recites a method that includes receiving a request to clone a first terminal with a second terminal, and in response to the request to clone, associating a logical identifier of the first terminal with the second terminal. Also, claim 1 recites receiving a second indication from the second terminal for initiating a call session with a third terminal, and in response to the second indication, accessing profile information associated with the *first* terminal to process the second indication for establishing the call session between the *second* terminal and the *third* terminal.

O'Neal describes a call forwarding service and a "follow me" (see Figs. 3-4 of O'Neal). The call forwarding service when enabled allows incoming calls to be routed to a provided forwarding number. O'Neal, 11:52-55. The "follow me" service gives the subscriber the ability to designate a set of telephone numbers where the subscriber is likely to be found and gives the caller the option to try to find a subscriber at those numbers. O'Neal, 12:4-8. However, O'Neal does not disclose receiving a second indication from the second terminal (which clones the first terminal) for initiating a call session with a third terminal, wherein in response to the second indication, profile information associated with the *first* terminal is accessed to process the second indication for establishing the call session between the *second* terminal and the *third* terminal. This type of cloning is not performed in O'Neal. Therefore, claim 1 is not anticipated by O'Neal.

Claims dependent from claim 1, including newly added claims 45 and 46, are allowable for at least the same reasons. Moreover, newly added dependent claim 45, which depends from claim 1, recites that accessing the profile information comprises accessing speed dial information of the first terminal to establish the call session between the second and third terminals. Such a feature is also not disclosed by O'Neal.

Amended independent claim 3 is allowable over Alexander. Claim 3 recites a method that includes receiving a request to clone a first terminal with a second terminal, and in response to the request to clone, associating a logical identifier of the first terminal with the second terminal. Also, claim 3 recites receiving a call request from the second terminal to initiate a call session with a third terminal, and in response to the call request, accessing profile information of the *first* terminal to establish the call session between the *second* terminal and *third* terminal.

Alexander describes a call manager that is able to access an alternate number list containing alternate numbers that the call manager can access in response to a call request. However, Alexander does not disclose the subject matter added to claim 3.

Claims dependent from claim 3, including newly added dependent claims 47 and 48, are allowable for at least the same reasons. Moreover, newly added dependent claim 47, which depends from claim 3, recites that accessing the profile information comprises accessing speed dial information of the first terminal to establish the call session between the second and third terminals. Such a feature is not disclosed by Alexander.

Independent claim 37 was also rejected as being anticipated by Alexander. The Office Action identified an IP telephony device 24 or 42 depicted in Fig. 1 of Alexander as containing the control unit recited in claim 37. 5/17/2005 Office Action at 6. The Office Action referred to the reference to telephony software that can be included in an IP telephony device mentioned in column 4, lines 1-8, of Alexander. The Office Action further stated that "[c]learly, the computer can run one or more of these modules." *Id.* There is no support for this statement, since Alexander makes no mention whatsoever of multiple soft client modules executable on any IP telephony device. More significantly, Alexander is completely silent on the fact that the multiple soft client modules become *clones of respective terminals*. As further support for the rejection, the Office Action cited column 12, lines 55-65, of Alexander. Note, however, that this cited passage teaches that multiple IP telephony devices can be used to remotely access and edit a telephony device's alternate number list. There is no teaching here of multiple soft client modules executable on a control unit that can become clones of respective terminals.

Therefore, it is respectfully submitted that claim 37, and its dependent claims, are not anticipated by Alexander.

Independent claim 16 was rejected as being obvious over Alexander and "AAPA." The Office Action conceded that Alexander fails to disclose associating a first logical port between a

telephony proxy server and a switch module with both the first and second terminals, and forwarding, by the switch module, the call request through the first logical port to the telephony proxy server. 5/17/2005 Office Action at 8. The Office Action cited "AAPA" as disclosing use of logical ports between a TPS and a switch. Although the Background section of the present application mentions that a logical port can be reserved in a switch for a telephony client, there is absolutely no suggestion in the Background section of the present application, or in Alexander, of associating a first logical port between a TPS and a switch module with *both* the first and second terminals. Moreover, there is no suggestion in the Background section of the present application of forwarding, by the switch module, the call request (which specifies the second terminal) through the first logical port to the telephony proxy server.

What the Office Action has engaged in is a classic example of using impermissible hindsight to piece together un-related elements from several references to achieve the claimed invention. Alexander provides absolutely no hint whatsoever that it would even be desirable to incorporate a TPS and a switch module with a logical port provided therebetween. Moreover, there is no suggestion in either Alexander or the Background section of the present application of associating a logical port between a TPS and switch module with *both* the first and second terminals. Because the Office Action has failed to cite to any evidence that would have suggested to a person of ordinary skill in the art the proposed modification of Alexander based on the teachings of "AAPA," it is respectfully submitted that the Office Action has failed to establish a *prima facie* case of obviousness with respect to claim 16 (and its dependent claims). *See* M.P.E.P. § 2143 (8th ed., Rev. 2), at 2100-129.

Independent claim 23 was rejected as being obvious over Alexander, "AAPA," and O'Neal. The Office Action conceded that Alexander does not disclose storing a table associating identifiers of the first and second terminals with a first logical port. 5/17/2005 Office Action at 11. However, the Office Action relied upon "AAPA" as disclosing the use of a logical port. However, "AAPA" does not suggest storing a table associating identifiers of both first and second terminals with a first logical port. Based on the discussion above with respect to claim 16, it is respectfully submitted that no motivation or suggestion existed to combine the teachings of Alexander and "AAPA," and thus the obviousness rejection over Alexander, "AAPA," and O'Neal is also defective.

Moreover, the Office Action conceded that Alexander and "AAPA" does not teach updating a table to indicate that one of the first and second terminals that answered the call requests is the terminal to which subsequent call requests containing the first logical identifier are to be directed. 5/17/2005 Office Action at 12. However, the Office Action cited O'Neal as teaching this element. Specifically, the Office Action pointed to column 12, lines 54-57, of O'Neal as teaching this recited element. The cited passage refers to the "follow me" service that uses the number where the subscriber was last located (stored in memory) as the first number to dial in the sequence. Note, however, that even O'Neal does not teach or suggest updating a *table* (that associates identifiers of first and second terminals with a first logical port) to indicate that one of the first and second terminals that answered the call request is the terminal to which subsequent call requests containing the first logical identifier are to be directed. Therefore, because none of Alexander, "AAPA," and O'Neal teaches or suggests this last element (the update element) of claim 13, the *prima facie* case of obviousness is defective.

Dependent claims of claim 23 are allowable for at least the same reasons.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (NRC.0008US).

Respectfully submitted,

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